

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

)	Master File No.: 12-md-02311
In Re: AUTOMOTIVE PARTS)	Honorable Marianne O. Battani
ANTITRUST LITIGATION)	Special Master Gene J. Esshaki
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)	
In Re: All Auto Parts Cases)	2:12-MD-02311-MOB-MKM
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)	
THIS DOCUMENT RELATES TO:)	
ALL AUTO PARTS CASES)	
)	

CERTAIN SPECIFIED SUBPOENAED ENTITIES'
MOTION TO EXCEED PAGE LIMITS

Pursuant to Local Rule 7.1(d)(3), certain Specified Subpoena Entities (“SSEs”)¹ hereby respectfully request leave to file a 12-page reply brief in support of their objections to the Special

¹ The following SSEs join in this Motion: **FCA (Chrysler) Entities:** FCA US LLC; Fiat Chrysler Finance North America, Inc.; **Daimler Entities:** Daimler North America Corp. (MI); Daimler North America Corp. (NJ); Daimler Purchasing Coordination Corp.; Daimler Trucks North America LLC; Daimler Vans Manufacturing, LLC; Daimler Vans USA LLC; Freightliner Custom Chassis Corp.; Mercedes-Benz Advanced Design of North America Inc.; Mercedes-Benz Credit Corp.; Mercedes-Benz Financial Services USA LLC; Mercedes-Benz Research & Development North America, Inc. (CA); Mercedes-Benz Research & Development North America, Inc. (MI); Mercedes-Benz U.S. International, Inc.; Mercedes-Benz USA, LLC; Mitsubishi Fuso Truck of America, Inc.; Thomas Built Buses, Inc.; Western Star Trucks Sales, Inc.; **GM Entities:** General Motors Company; General Motors Financial Company, Inc.; General Motors Holdings LLC; General Motors LLC; **Honda Entities:** American Honda Motor Co., Inc.; American Honda Finance Corp.; Honda Manufacturing of Indiana, LLC; Honda North America, Inc.; Honda of America Mfg., Inc.; Honda of South Carolina Mfg., Inc.; Honda Precision Parts of Georgia, LLC; Honda R&D Americas, Inc.; Honda Research Institute USA, Inc.; Honda Transmission Manufacturing of America, Inc.; **Hyundai Entities:** Hyundai Motor Manufacturing Alabama, LLC, Hyundai America Technical Center, Inc., Hyundai Motor America, Hyundai Autoever America, LLC, Hyundai Capital America; **Kia Entities:** Kia Motors Manufacturing Georgia, Inc., Kia Motors America, Inc.; **Nissan Entities:** Nissan North America, Inc.; Nissan Design America, Inc. (part of NNA); Nissan Technical Center North America, Inc. (part of NNA); Nissan Diesel America, Inc. (part of NNA); Nissan Motor Acceptance Corp.; **Subaru Entities:** Subaru of America, Inc., Subaru Leasing Corp., Fuji Heavy Industries U.S.A.,

Master's April 20, 2016 order regarding the parties' motion to compel discovery from non-party SSEs and ordering non-party Rule 30(b)(6) depositions.

The Certain SSEs' Objections to the Special Master's Order were 17 pages long, exclusive of signatures. ECF 1316. With leave of the Court, the Parties filed a 30-page omnibus response, exclusive of signatures, with 170 pages of exhibits, responding to the Certain SSEs' Objections as well as to several shorter objections, statements, and joinders by various SSEs. ECF 1354. Given the length of the Parties' response brief and exhibits, as well the number of SSEs and the number and complexity of the issues raised, a reply within the 5-page limit under Judge Battani's Practice Guidelines is insufficient to adequately respond to all issues raised by the Parties' response. Additional space was also required to correct the record in light of numerous assertions made by the Parties in their opposition brief, the May 11th hearing, and elsewhere regarding the SSEs' participation in these proceedings.

WHEREFORE, the SSEs respectfully ask the Court to enter an order granting leave to file a 12-page reply brief, exclusive of signatures, in support of their objections to the Special Master's April 20, 2016 order regarding the parties' motion to compel discovery from non-party OEMs and ordering non-party Rule 30(b)(6) depositions.

Dated: May 23, 2016

Respectfully submitted,

BUSH SEYFERTH & PAIGE PLLC

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 23, 2016. Any other counsel of record will be served by first class mail.

By: /s/ Cheryl A. Bush